

Message

---

**From:** Dourson, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BB29BF491D9A4C3AB569022BCD205A0A-DOURSON, MI]  
**Sent:** 12/19/2017 1:48:00 PM  
**To:** Ohanian, Edward [Ohanian.Edward@epa.gov]  
**BCC:** Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Beck, Nancy [beck.nancy@epa.gov]  
**Subject:** PFOA  
**Attachments:** cotstatementpfoa200902.pdf

Ed

I know that you are familiar with the Committee on Toxicology of the UK. Alan Boobis, another Lehman awardee, was on this for quite some time. The COT (2009) had a statement on PFOA/S that challenges the current OW position (see item 20 of the attached text). What was OW's response to this? Might not a focus on Cmax, rather than AUC, bridge this very large difference (the COT analysis would result in a HA of 11 ppb). I would be happy to sit down with your folks to discuss this in more depth.

BTW, I was surprised that the OW 2009 position used a BMD for the Lau et al study, similar to EFSA (see attached text items 12 and 13), but OW's new position does not use a BMD, but rather a LOAEL. This of course results in an approximately 10-fold lower number. After reading the study carefully, I could see why OW did this, because reduced ossification of the cranium (calvaria---Table 2 of Lau) and enlarged soft spot in the head (fontanel---Table 2 of Lau) and preputial separation (Table 5 of Lau) were affected at the lowest concentration. Unfortunately, these effects were not at all dose related. I highly suspect that an erudite risk assessment review group would not have let this pass. Rather, they would have directed OW to conduct a BMD analysis. This saves the use of an uncertainly factor, and lowering a safe dose unnecessarily, which of course, was one of the principle reasons why EPA developed the BMD approach in 1983.

Cheers!

Michael...

... L. Dourson, PhD., DABT, FATS, FSRA  
Senior Advisor to the Administrator  
U.S. Environmental Protection Agency

[dourson.michael@epa.gov](mailto:dourson.michael@epa.gov)

202-564-2463

[www.epa.gov](http://www.epa.gov)